

UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF NEW YORK

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9384-2557 Québec Inc., a Canadian
corporation; MINEDMAP, INC., a Nevada
corporation; and SERENITY ALPHA, LLC, a
Nevada limited liability, and other similarly
situated individuals

Plaintiff, :

against :

NORTHWAY MINING, LLC, a New York
limited liability company; MICHAEL
MARANDA, an individual; MICHAEL CARTER,
an individual; CSX4236 MOTORCYCLE
SALVAGE, LLC, a New York limited liability
company; DROR SVORAI, an individual;
MINING POWER GROUP, INC., a Florida
corporation; HUDSON DATA CENTER, INC, a
New York Corporation, MICHAEL MARANDA,
LLC, a New York Limited liability company;
PORTER KING HILL CONTRACTING, LLC, a
New York limited liability company;
COINMINT, LLC, a Delaware limited liability
company; OSWEGO DATA LLC, a New York
Limited Liability Company; LORI S.
THOMPSON, LCSW, PLLC, a professional
limited liability corporation; LORI S.
THOMPSON, an individual, ANTHONY
PORTER, an individual; and DONALD
D'AVANZO, an individual

Defendants. :

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1:19-CV-00501-TJM-CFH

NOTICE RE: MOTION FOR AN
ORDER OF SEIZURE

(ECF Case)

Plaintiffs, Serenity Alpha et. al., through counsel, WILLIAMS LLP submit this Notice re: Motion for Order of Seizure and state that, for the reasons detail below, Plaintiffs did not take the four bitcoin miners they identified while at the Defendants' facilities, and so, Plaintiffs will not seek an order to seize those miners.

1. Plaintiffs representatives, Daniel Kim and Allen Song, traveled from Nevada to New York to pick up their bitcoin miners pursuant to the July 16, 2020 Writ of Replevin. After an exhaustive search of the bitcoin miners at the facilities that Defendants and their counsels claimed were housing Plaintiffs' miners, Mr. Song and Mr. Kim thought that they had at least found four of Plaintiffs' bitcoin miners:





2. However, upon inspection, Mr. Song and Mr. Kim learned that they had not in fact found four of Plaintiffs' miners. Instead, Defendants, Michael Carter, Michael Maranda, and nonparty, Melissa Welsh, had transposed serial numbers from other bitcoin miners onto Plaintiffs' bitcoin miners. Leaving aside the civil and criminal implications of the Defendants and Ms. Welsh's actions, Defendants and Ms. Welsh were sloppy: in transposing serial numbers, Defendants, Maranda and Carter, and Ms. Welsh transposed the same serial numbers onto three different bitcoin miners. Consequently, the serial number YDFT43RARJGAE5361 appears on three different bitcoin miners. In the pictures above, only the picture in the top right corner (on page 2) has a different serial number from the remaining three miners. Realizing Defendants' and Ms. Welsh's ruse, Plaintiffs refused to take the four bitcoin miners above. Consequently, Plaintiffs do not need an order of seizure.

Dated this 28th day of July 2020.
New York, New York

RESPECTFULLY SUBMITTED,

WILLIAMS LLP

/s/ T. Edward Williams, Esq.

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CERTIFICATE OF SERVICE

I hereby certify that on this 28th day of July 2020, this NOTICE RE: MOTION FOR ORDER OF SEIZURE was served on the following individuals:

John Harwick, Esq. via ECF
Benjamin F. Niedl, Esq. via ECF
Counsel for Maranda Defendants